

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff,

 \mathbf{v}_i

**MOTOROLA MOBILITY, INC. and
CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS.**

Defendants.

Civil Action No. 6:12-cv-00016 (LED)

**PLAINTIFF’S REPLY TO DEFENDANT
MOTOROLA MOBILITY INC.’S COUNTERCLAIMS**

Plaintiff, ADAPTIX Inc. (“ADAPTIX”), replies to the counterclaims of defendant, Motorola Mobility, Inc., (“Motorola”), as follows:

PARTIES

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. ADAPTIX denies that a controversy exists relating to the enforceability of the patents-in-suit as Motorola has made no such allegation. The remaining allegations of paragraph 3 are admitted.
4. Admitted.

COUNT I

5. ADAPTIX incorporates by reference each preceding response as though expressly stated herein.

6. Denied.

7. ADAPTIX admits that Motorola seeks such a declaration but denies that Motorola is entitled to such relief.

COUNT II

8. ADAPTIX incorporates by reference each preceding response as though expressly stated herein.

9. Denied.

10. ADAPTIX admits that Motorola seeks such a declaration but denies that Motorola is entitled to such relief.

COUNT III

11. ADAPTIX incorporates by reference each preceding response as though expressly stated herein.

12. Denied.

13. ADAPTIX admits that Motorola seeks such a declaration but denies that Motorola is entitled to such relief.

COUNT IV

14. ADAPTIX incorporates by reference each preceding response as though expressly stated herein.

15. Denied.

16. ADAPTIX admits that Motorola seeks such a declaration but denies that Motorola is entitled to such relief.

COUNT V

17. ADAPTIX incorporates by reference each preceding response as though expressly stated herein.

18. Denied.

JURY DEMAND

19. ADAPTIX admits that Motorola claims a trial by jury and ADAPTIX demands trial by jury on all issues set forth in Motorola's Answer, Affirmative Defenses, and Counterclaims so triable.

PRAYER FOR RELIEF

WHEREFORE, ADAPTIX respectfully requests that this Court:

- a. Enter judgment in favor of ADAPTIX on all issues set forth in Motorola's Answer, Affirmative Defenses and Counterclaims;
- b. Deny all relief requested in Motorola's Answers, Affirmative Defenses and Counterclaims;
- c. Grant the relief requested by ADAPTIX in its complaint, and
- d. Grant ADAPTIX such further relief as this Court may deem just and proper.

Date: March 15, 2012

ADAPTIX, INC.

By: Paul J. Hayes (w/permission W.Hill)

Paul J. Hayes – LEAD ATTORNEY

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**ATTORNEYS FOR THE PLAINTIFF
ADAPTIX, INC.**

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this 15th day of March, 2012, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

Paul J. Hayes (w/permission W.Hill)

Paul J. Hayes